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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \* \* \*

PATRICIA J. SHANNON )

Plaintiff, )

vs. )

CASE NO.: 2:11-CV-0394 JCM-CWH

MICHAEL J. ASTRUE,  
COMMISSIONER OF  
SOCIAL SECURITY, )

Defendant. )

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE A REPLY TO DEFENDANT'S MOTION TO AFFIRM,  
MEMORANDUM IN SUPPORT OF AND IN OPPOSITION TO  
PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND**

**(First Request)**

Plaintiff, PATRICIA J. SHANNON by and through her attorney of record, RICHARD E. DONALDSON, ESQ., respectfully requests an extension of time of two additional business days, to and including, November 9, 2011, in which to file a Reply to Defendant's Motion to Affirm, Memorandum in Support of and in Opposition to Plaintiff's Motion for Reversal and/or Remand.

This request is necessary so that the Plaintiff can finish the writing of the Reply, which has taken much longer than anticipated. At the present time, Plaintiff's deadline to file the Reply is Saturday, November 5, 2011, and counsel has been unable to finish the

1 reply before the close of Court's business today. This request is being filed as a Motion as  
2 the undersigned counsel has been unable to contact Carlos A. Gonzalez, Assistant United  
3 States Attorney and counsel of record for the Defendant. Mr. Gonzalez and undersigned  
4 counsel have a standing agreement to stipulate to motions for an extension of time, and on  
5 information and belief, Mr. Gonzalez does not oppose this Motion.

6 This is the first request for an extension of time to file a Reply.

7 DATED this 11th day of April, 2011.

8 Respectfully submitted,

9 RICHARD E. DONALDSON, ESQ., CHTD.

10 By: \_\_\_\_\_  
11 RICHARD E. DONALDSON, ESQ., CHTD.

12 IT IS SO ORDERED:

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14 \_\_\_\_\_  
UNITED STATES JUDGE

15 DATED: November 7, 2011  
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